

**EXHIBIT “A”**

IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO

Date: April 14, 2022

Case No: **22CV095012**

WILLIAM P. CAMPBELL  
6105 PARKLAND BOULEVARD  
MAYFIELD HEIGHTS, OH 44124

BLAKE ANDERSEN  
Plaintiff

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.  
Defendants

**NOTICE OF FAILURE OF SERVICE**

To: WILLIAM P. CAMPBELL

(Attorney of Record or Party of Instance)

You are hereby notified of the failure of service upon:

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER  
3024 BRECKSVILLE ROAD  
RICHFIELD, OH 44286

By Certified Mail pursuant to Rule 4 through Rule 4.6 of Ohio Rules of Civil Procedure.

REASON FOR RETURN:  
NOT DELIVERABLE AS ADDRESSED

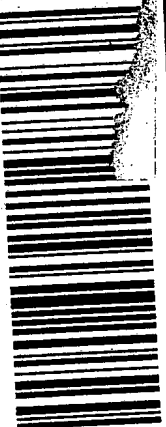
JAMES L. SPAETH, Clerk of Courts  
500 Justice Drive - P.O. Box 238  
Lebanon, Ohio 45036



By: \_\_\_\_\_  
Deputy Clerk

**JAMES L. SPAETH**  
CLERK OF COURTS, WARREN COUNTY  
P.O. BOX 238, LEBANON, OHIO 45036

7019 1120 0001 5149 9118



RETURN RECEIPT REQUESTED

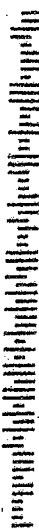
22CV095012 3/24/22  
RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
INC.  
C/O OWNER  
3024 BRECKSVILLE ROAD  
RICHFIELD, OH 44286

*[Handwritten signature]*

NIXIE 482 DE 1 0004/09/22

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 45036023838 0080N099064-06523



**CONTENTS REMOVED**

*JS 4/14/22*

**SENDER: COMPLETE THIS SECTION**

- ☐ Complete items 1, 2, and 3.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

22CV095012  
 WILLIE BURNS JR  
 4012 91ST AVENUE  
 SPRINGDALE, MD 20774



9590 9402 6920 1104 0438 13

Article Number (Transfer from service label)

7019 1120 0001 5149 9132

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

B. Received by (Printed Name)

☐ Agent☐ Addressee

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

or delivery address below:

☐ No

3/24/22

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

all Restricted Delivery

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- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

22CV095012  
 RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
 INC  
 C/O OWNER 3200 RUAN CENTER  
 666 GRAND AVENUE  
 DES MOINES, IA 50309



9590 9402 6920 1104 0437 83

2. Article Number (Transfer from service label)

7019 1120 0001 5149 9101

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *[Signature]* (correct)  
*S. HUNT* (2019-19)

☒ Agent☐ Addressee

B. Received by (Printed Name)

*S. BRONE*

C. Date of Delivery

*3-28-22*D. Is delivery address different from item 1? ☐ Yes

If delivery address below:

☒ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☒ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

fail

fail Restricted Delivery

0)

22CV095012

3/24/22

WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774

22CV095012

3/24/22

WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774

22CV095012

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WILLIE BURNS JR

4012 91ST AVENUE

SPRINGDALE, MD 20774



22CV095012

3/24/22

RUAN TRANSPORTATION INC

C/O OWNER 3200 RUAN CENTER

666 GRAND AVENUE

DES MOINES, IA 50309

22CV095012

3/24/22

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3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
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C/O OWNER 3200 RUAN CENTER  
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C/O OWNER 3200 RUAN CENTER  
666 GRAND AVENUE  
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22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS

INC

C/O OWNER

3024 BRECKSVILLE ROAD

RICHFIELD, OH 44286

22CV095012

3/24/22

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INC

C/O OWNER

3024 BRECKSVILLE ROAD

RICHFIELD, OH 44286



22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
INC

C/O OWNER

3024 BRECKSVILLE ROAD

RICHFIELD, OH 44286

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS

INC

C/O OWNER

1905 CLARKSON WAY

LANDOVER, MD 20785-3221

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
INC

C/O OWNER

1905 CLARKSON WAY

LANDOVER, MD 20785-3221

22CV095012

3/24/22

RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
INC

C/O OWNER

1905 CLARKSON WAY

LANDOVER, MD 20785-3221

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**SENDER: COMPLETE THIS SECTION**

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**1. Article Addressed to:**

22CV095012  
 WILLIE BURNS JR  
 4012 91ST AVENUE  
 SPRINGDALE, MD 20774

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature ☐ Agent  
**X** *Willie Burns Jr* ☐ Addressee  
 B. Received by (Printed Name) C. Date of Delivery  
 D. Is delivery address different from item 1? ☐ Yes  
 or delivery address below: ☐ No

3/24/22



9590 9402 6920 1104 0438 13

Transfer from service label

7019 1120 0001 5149 9132

PS Form 3811, July 2020 PSN 7530-02-000-9053

3. Service Type  
☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Mail Restricted Delivery  
☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

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☒ Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

22CV095012  
 RUAN TRANSPORTATION MANAGEMENT SYSTEMS  
 INC  
 C/O OWNER 3200 RUAN CENTER  
 666 GRAND AVENUE  
 DES MOINES, IA 50309



9590 9402 6920 1104 0437 83

**2. Article Number (Transfer from service label)**

7019 1120 0001 5149 9101

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature S. HUNT (CORRECTION) ☒ Agent ☐ Addressee  
 X S. HUNT (CORRECTION)  
 B. Received by (Printed Name) S. HUNT C. Date of Delivery 3-28-22  
 D. Is delivery address different from item 1? ☐ Yes ☒ No

3/24/22

3. Service Type  
☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

fail  
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 Restricted Delivery

Domestic Return Receipt

**SUMMONS**

**WARREN COUNTY COURT OF COMMON PLEAS  
500 JUSTICE DRIVE - P.O. BOX 238  
LEBANON, OHIO 45036**

**CASE # 22CV095012**

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

**TO THE FOLLOWING NAMED PARTY:**

WILLIE BURNS JR  
4012 91ST AVENUE  
SPRINGDALE, MD 20774

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

**You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.**

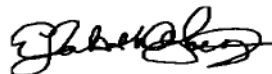
Failure to appear and present a defense to this complaint will result in a judgment by default being rendered against you for the relief demanded in the complaint.

The address of his/her attorney is:

WILLIAM P. CAMPBELL, ATTORNEY AT LAW  
6105 PARKLAND BOULEVARD  
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts  
500 Justice Drive - P.O. Box 238  
Lebanon, Ohio 45036

By:



ELIZABETH LEISZ, DEPUTY CLERK  
March 24, 2022

IF THE ABOVE NAMED DEFENDANT IS A CORPORATION PLEASE REFER TO OHIO REVISED  
CODE 4705.01.

**SUMMONS**

**WARREN COUNTY COURT OF COMMON PLEAS  
500 JUSTICE DRIVE - P.O. BOX 238  
LEBANON, OHIO 45036**

**CASE # 22CV095012**

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

**TO THE FOLLOWING NAMED PARTY:**

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER 3200 RUAN CENTER  
666 GRAND AVENUE  
DES MOINES, IA 50309

You have been named in a complaint filed in this court by the following party :

BLAKE ANDERSEN

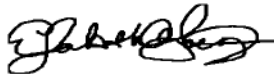
**You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.**

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**SUMMONS**

**WARREN COUNTY COURT OF COMMON PLEAS  
500 JUSTICE DRIVE - P.O. BOX 238  
LEBANON, OHIO 45036**

**CASE # 22CV095012**

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

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RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER  
1905 CLARKSON WAY  
LANDOVER, MD 20785-3221

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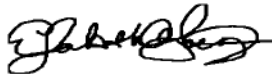
**You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.**

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By: 

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March 24, 2022

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## SUMMONS

WARREN COUNTY COURT OF COMMON PLEAS  
500 JUSTICE DRIVE - P.O. BOX 238  
LEBANON, OHIO 45036

CASE # 22CV095012

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

**TO THE FOLLOWING NAMED PARTY:**

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER  
3024 BRECKSVILLE ROAD  
RICHFIELD, OH 44286

You have been named in a complaint filed in this court by the following party :

BLAKE ANDERSEN

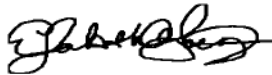
**You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.**

Failure to appear and present a defense to this complaint will result in a judgment by default being rendered against you for the relief demanded in the complaint.

The address of his/her attorney is:

WILLIAM P. CAMPBELL, ATTORNEY AT LAW  
6105 PARKLAND BOULEVARD  
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts  
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By: 

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March 24, 2022

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**SUMMONS**

**WARREN COUNTY COURT OF COMMON PLEAS  
500 JUSTICE DRIVE - P.O. BOX 238  
LEBANON, OHIO 45036**

**CASE # 22CV095012**

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

**TO THE FOLLOWING NAMED PARTY:**

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER 3200 RUAN CENTER  
666 GRAND AVENUE  
DES MOINES, IA 50309

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

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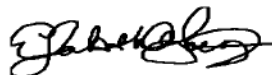
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James L. Spaeth, Clerk of Courts  
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Lebanon, Ohio 45036

By:



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March 24, 2022

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CODE 4705.01.

**SUMMONS**  
**WARREN COUNTY COURT OF COMMON PLEAS**  
**500 JUSTICE DRIVE - P.O. BOX 238**  
**LEBANON, OHIO 45036**

**CASE # 22CV095012**

BLAKE ANDERSEN

VS

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC, ET. AL.

**TO THE FOLLOWING NAMED PARTY:**

RUAN TRANSPORTATION MANAGEMENT SYSTEMS INC  
C/O OWNER 3200 RUAN CENTER  
666 GRAND AVENUE  
DES MOINES, IA 50309

You have been named in a complaint filed in this court by the following party:

BLAKE ANDERSEN

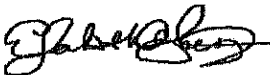
**You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff if he has no attorney of record, a copy of your answer to this complaint within twenty-eight (28) days after service of this summons upon you, excluding the date of service. Your answer must also be filed with our court within three days after the service of a copy of the answer on the plaintiff's attorney.**

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6105 PARKLAND BOULEVARD  
MAYFIELD HEIGHTS, OH 44124

James L. Spaeth, Clerk of Courts  
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By:   
ELIZABETH LEISZ, DEPUTY CLERK  
March 24, 2022

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CODE 4705.01.

COMMON PLEAS COURT  
WARREN COUNTY, OHIO  
FILED

2022 MAR 24 AM 10:10

JAMES L. SPAETH  
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS  
WARREN COUNTY, OHIO

BLAKE ANDERSEN  
5620 Maple Street  
Kings Mills, OH 45034

Plaintiff

vs.

RUAN TRANSPORTATION MANAGEMENT  
SYSTEMS, INC.  
c/o Owner  
3200 Ruan Center  
666 Grand Avenue  
Des Moines, IA 50309

and

RUAN TRANSPORTATION MANAGEMENT  
SYSTEMS, INC.  
c/o Owner  
3024 Brecksville Road  
Richfield, OH 44286

and

RUAN TRANSPORTATION MANAGEMENT  
SYSTEMS, INC.  
c/o Owner  
1905 Clarkson Way  
Landover, MD 20785-3221

and

CASE NO.:

22CV95012

JUDGE:

JUDGE TEPE

COMPLAINT

(Jury Demand Endorsed Hereon)

RUAN TRANSPORTATION, INC. )  
c/o Owner )  
3200 Ruan Center )  
666 Grand Avenue )  
Des Moines, IA 50309 )  
 )  
and )  
 )  
WILLIE BURNS, JR. )  
4012 91<sup>st</sup> Avenue )  
Springdale, MD 20774 )  
 )  
and )  
 )  
JOHN DOE 1-10 )  
(Names and addresses unknown.) )  
(Defendants JOHN DOE 1-10 are intended )  
to be any and all individuals and/or entities )  
who are liable to the Plaintiff for the )  
injuries and damages caused by the subject )  
collision, including, but not limited to, any )  
and all uninsured motorist insurance )  
carriers and/or any individual and/or entity )  
whose negligence and/or recklessness )  
directly and proximately caused the subject )  
collision. Despite a good faith effort being )  
made by the Plaintiff and his attorneys, the )  
names and addresses of Defendants JOHN )  
DOE 1-10 could not be ascertained prior )  
to the filing of Plaintiff's Complaint.) )  
 )  
Defendants. )

Now comes Plaintiff BLAKE ANDERSEN, by and through his attorney, William P. Campbell  
of the law firm of Elk and Elk Co., Ltd., and for his complaint, states as follows:

COUNT I

1. On or about April 5, 2020, on a public roadway called Mason Montgomery Road,  
in Deerfield Township, Ohio, in Warren County, Defendant WILLIE BURNS, JR. negligently

and/or recklessly operated a motor vehicle into collision with the bicycle being operated by Plaintiff BLAKE ANDERSEN and permanently injuring Plaintiff BLAKE ANDERSEN.

2. Defendants JOHN DOE 1-10 (names and addresses unknown) are intended to be any and all individuals and/or entities who are liable to the Plaintiff for the injuries and damages caused by the subject collision, including, but not limited to, any and all uninsured motorist insurance carriers and/or any individual and/or entity whose negligence and/or recklessness directly and proximately caused the subject collision. Despite a good faith effort being made by the Plaintiff and his attorneys, the names and addresses of Defendants JOHN DOE 1-10 could not be ascertained prior to the filing of Plaintiff's Complaint.

3. At all times herein, Defendant WILLIE BURNS, JR. was operating said vehicle within the course and scope of his employment with Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC.

4. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is vicariously liable for the negligence and/or recklessness of its employee and/or agent and/or representative Defendant WILLIE BURNS, JR.

5. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is liable for the conduct of Defendant WILLIE BURNS, JR., as described herein, based on the Doctrine of Respondeat Superior.

6. Furthermore, Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. is liable for the negligence and/or recklessness of Defendant WILLIE BURNS, JR. based on Defendant WILLIE BURNS, JR. being a

representative and/or agent and/or employee and/or driver of Defendant RUAN  
TRANSPORTATION MANAGEMENT SYSTEMS, INC.

7. The negligence and/or recklessness of all of the Defendants has  
combined to cause Plaintiff BLAKE ANDERSEN indivisible harm.

8. As a direct and proximate result of the negligence and/or recklessness of the  
Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN suffered  
serious and permanent injuries which caused pain, physical and mental suffering, disability and  
permanent damage.

9. As a direct and proximate result of the negligence and/or recklessness of the  
Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN needed  
medical care and treatment and will, in all likelihood, need additional medical care and  
treatment in the indefinite future.

10. As a direct and proximate result of the negligence and/or recklessness of the  
Defendant, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN has incurred  
medical and hospital expenses and will, in all likelihood, incur further such expenses in the  
indefinite future.

11. As a direct and proximate result of the negligence and/or recklessness of the  
Defendants, jointly and/or severally and/or concurrently, Plaintiff BLAKE ANDERSEN has lost  
time and earnings from his employment and will, in all likelihood, lose further time and  
earnings in the indefinite future. Plaintiff BLAKE ANDERSEN's future earning capacity has been  
permanently impaired.



**THEREFORE:** Plaintiff BLAKE ANDERSEN demands damages against Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. and/or Defendant WILLIE BURNS, JR. and/or Defendants JOHN DOE 1-10 (names and addresses unknown), jointly and/or severally and/or concurrently, in an amount, in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), which will fully, fairly and justly compensate Plaintiff BLAKE ANDERSEN for his injuries, damages and costs.

**WHEREFORE:** Plaintiff BLAKE ANDERSEN demands damages against the Defendants as follows:

On Count I of Plaintiff's Complaint, for a judgment against Defendant RUAN TRANSPORTATION MANAGEMENT SYSTEMS, INC. and/or Defendant RUAN TRANSPORTATION, INC. and/or Defendant WILLIE BURNS, JR. and/or Defendants JOHN DOE 1-10 (names and addresses unknown), jointly and/or severally and/or concurrently, and in favor of Plaintiff BLAKE ANDERSEN, in an amount, in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), which will fully, fairly and justly compensate Plaintiff BLAKE ANDERSEN for his injuries, damages and costs;

Interest at the rate of 10% per annum; and

The costs of the within action; and

Any other further relief to which this Court determines Plaintiff is entitled at law or in equity.

JURY DEMAND

Pursuant to Rule 38(B) of the Ohio Rules of Civil Procedure, Plaintiff hereby demands trial by the maximum number of jurors allowed by law.

Respectfully Submitted,  
ELK AND ELK CO., LTD.

By: \_\_\_\_\_

  
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